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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
TRACY ARNETT,  
DANIEL HOOKER,  
SANDRO DUVAL, and  
SHELINA BISSETT,  
  
Defendants.

CASE NO. 2:24-cr-00068 DAD

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: August 27, 2024  
TIME: 9:30 a.m.  
COURT: Hon. Dale A. Drozd

The United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. This matter currently is set for a status conference on May 28, 2024, and time has been excluded under the Speedy Trial Act through that date, pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) [Local Code T4]. ECF 6 (Hooker), 8 (Arnett), 28 (Duval and Bissett).

2. By this stipulation, the parties request that this Court continue the status conference to August 27, 2024, at 9:30 a.m., and exclude time from May 28, 2024, through August 27, 2024, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

3. The parties agree and stipulate, and request the Court find, the following:

a) The government has produced substantial discovery associated with this case that

1 includes investigative reports and related documents in electronic form totaling over 10  
2 megabytes of data, including several video and audio recordings and surveillance photographs.  
3 All of this discovery has been either produced directly to counsel and/or made available for  
4 inspection and copying.

5 b) Counsel for defendants' desire additional time to review the discovery, consult  
6 with their clients, review the current charges, conduct investigation and research related to those  
7 charges, and otherwise prepare for trial.

8 c) Counsel for defendants believe that failure to grant the above-requested  
9 continuance would deny them the reasonable time necessary for effective preparation, taking into  
10 account the exercise of due diligence.

11 d) The government does not object to the continuance.

12 e) Based on the above-stated findings, the ends of justice served by continuing the  
13 case as requested outweigh the interest of the public and the defendants in a trial within the date  
14 prescribed by the Speedy Trial Act.

15 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
16 et seq., within which trial must commence, the time period of May 28, 2024, to August 27, 2024,  
17 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4],  
18 because it results from a continuance granted by the Court at the defendants' request on the basis  
19 of the Court's finding that the ends of justice served by taking such action outweigh the best  
20 interest of the public and the defendants in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: May 22, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ MATTHEW THUESEN  
MATTHEW THUESEN  
WHITNEE GOINS  
Assistant United States Attorneys

Dated: May 22, 2024

/s/ MARK J. REICHEL  
MARK J. REICHEL  
Counsel for Defendant  
TRACY ARNETT

Dated: May 22, 2024

/s/ LINDA M. PARISI  
LINDA M. PARISI  
Counsel for Defendant  
DANIEL HOOKER

Dated: May 22, 2024

/s/ MICHAEL E. HANSEN  
MICHAEL E. HANSEN  
Counsel for Defendant  
SANDRO DUVAL

Dated: May 22, 2024

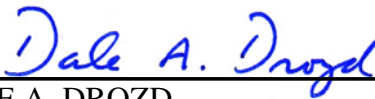
/s/ DANICA MAZENKO  
DANICA MAZENKO  
Counsel for Defendant  
SHELINA BISSETT

**ORDER**

Pursuant to the stipulation of the parties and good cause appearing, the status conference previously scheduled in this case for May 28, 2024 is continued to August 27, 2024, at 9:30 a.m., and time is excluded from May 28, 2024, through August 27, 2024, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

IT IS SO ORDERED.

Dated: May 23, 2024

  
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DALE A. DROZD  
UNITED STATES DISTRICT JUDGE